

U.S. ENVIRONMENTAL PROTECTION AGENCY
 POLLUTION/SITUATION REPORT
 Caswell, Strauss & Co., Inc.- 1670 Oak Tree Road - PJ1 - Removal Polrep
 Initial and Final Removal Polrep



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 Region II**

Subject: **POLREP #1**
Initial and Final
Caswell, Strauss & Co., Inc.- 1670 Oak Tree Road - PJ1
A296
Edison, NJ
Latitude: 40.5729227 Longitude: -74.3396019

To: Judith Enck, EPA
 Lisa Plevin, EPA
 Eric Mosher, USEPA , Region 2, ERRD-RPB
 Joe Rotola, USEPA Region 02
 Doug Kodama, USEPA Region 2 ERRD
 Dan Harkay, USEPA, Region 02, ERRD-RAB
 George Zachos, USEPA Region 2 ERRD
 Beckett Grealish, USEPA Region 2, ERRD, RAB
 Leah Graziano, ATSDR
 Tim Grier, USEPA Headquarters 5202G
 Elias Rodriguez, USEPA Region 02, PAD
 Wanda Ayala, EPA
 Jay Elliot, Edison Health Department
 William Reilly, EPA-R2-ORC
 Michael Fiore, EPA-R2-OIG
 Fred Mumford, NJDEP
 Bradi Montozzi, NJDEP

From: Kelli Lucarino, On-Scene Coordinator

Date: 7/29/2013

Reporting Period: November 2012 - July 2013

1. Introduction

1.1 Background

Site Number:	A296	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	CERCLA	Response Type:	Emergency
Response Lead:	PRP	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:		Start Date:	11/20/2012
Demob Date:		Completion Date:	7/10/2013
CERCLIS ID:	NJC200400968	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Lead contaminated soil.

1.1.2 Site Description

The Site is located in a mixed residential/commercial neighborhood in Edison Township, Middlesex County, New Jersey. The property formerly owned by Caswell, Strauss & Company, Inc. is currently occupied by Extra Space Storage on the southern portion, a strip mall in the southwestern portion and ten single-family residential properties on Hilltop Road on the northern portion.

1.1.2.1 Location

The Site is located in a mixed residential/commercial neighborhood in Edison Township, Middlesex County, New Jersey. The James Madison Primary School is located one mile to the northwest of the Site. As of the 2010 Census, the population of Edison Township, New Jersey was approximately 100,000 people. The property formerly owned by the Caswell, Strauss & Company, Inc. encompasses approximately 9.63 acres that covers a large portion of Hilltop Road and the 1600 block of Oak Tree Road. The southern portion of the former Caswell, Strauss & Company, Inc. property is currently owned and operated by Extra Space Storage, an active self-storage business, located at 1660 Oak Tree Road. The northern portion of the land formerly owned by Caswell, Strauss & Company, Inc. is currently owned and occupied by ten single-family residential properties on Hilltop Road. The south western portion of the land formerly owned by Caswell, Strauss & Company, Inc. is presently privately owned and occupied by a three unit strip mall. One store front is occupied by Moghul Express, an Indian restaurant, the other store front is occupied by Bombay Electronics, an electronics and parts retail store, and the third store front is vacant. Historically a dry cleaner was present in the store front that is currently vacant. The residential properties on Libby Court and Henry Street, as well as the commercial property located at 1680 Oak Tree Road, are adjacent to the property formerly owned by the Caswell, Strauss & Company, Inc.

The Dismal Swamp is located 2.5 miles southwest of the Site. The Dismal Swamp encompasses 1,240 acres and is on the EPA Priority Wetland List. The Dismal Swamp is home to several threatened and endangered species including the American bittern, bald eagle and spotted turtle.

Surface water runoff from the Properties enters storm sewers located along Libby Court, Hilltop Road and Henry Street. The storm sewers empty into an unnamed tributary of the Raritan River.

Topographically, the Site is located at approximately 155 feet above sea level and is located at 40° 34' 25.87" N latitude, 74°20'25.79"W longitude.

According to the Office of the New Jersey State Climatologist, Edison's average annual precipitation is 48.78 inches with the wettest month of the year occurring in July with an average rainfall of 4.97 inches.

1.1.2.2 Description of Threat

The contaminant identified at the Site is lead which is a hazardous substance as defined by Section 101 (14) of CERCLA and is listed in 40 CFR, Table 302.4. Analytical data from samples collected at

12 residences indicate that lead is present in the surface and subsurface soils at concentrations greater than the removal action level of 400 ppm and is considered to be a public health hazard.

Lead is a cumulative poison where increasing amounts can build up in the body eventually reaching a point where symptoms and disability occur. Particularly sensitive populations include children and pregnant women, because of the fetal transfer of lead. Cognitive deficits are associated with fetal and childhood exposure to lead. An increase in blood pressure is the most sensitive adverse health effect from lead exposure in adults. Effects of kidney, nervous system, and heme-forming elements are associated with increasing blood lead concentrations, both in children and adults. Other symptoms

include decreased physical fitness, fatigue, sleep disturbance, aching bones, abdominal pains and decreased appetite.

The relationship between soil lead concentrations and the consequent impact on blood levels in children has been studied through numerous epidemiological studies. Based on these epidemiological studies, it is generally believed that persistent exposure to soil-born lead results in an increase in blood lead levels (in children) of 1 to 9 ug/dl per 1,000 ppm lead in soil. Although this relationship may become less significant as exposure durations decrease and soil lead levels increase, it nonetheless provides compelling evidence of the potential lead hazard associated with the excessive lead concentrations found in soil at the Site.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

The Site was referred to the Environmental Protection Agency by the New Jersey Department of Environmental Protection in November 2011. Between January and May, 2012, EPA collected soil samples from a total of 29 residential properties located on Hilltop Road, Libby Court and Henry Street. The analytical results identified lead in concentrations greater than the EPA residential screening level of 400 parts per million at ten of the 29 properties sampled.

In addition to the residential properties, the EPA collected soil samples from two commercial properties located within the historic footprint of the former Caswell, Strauss & Company, Inc. property at 1660 and 1670 Oak Tree Road and one commercial property located adjacent to this property at 1680 Oak Tree Road. Analytical results identified lead in concentrations greater than the EPA commercial screening level of 800 ppm on all three properties. Lead was detected in concentrations ranging from 12 ppm to 61,100 ppm on the 1660 Oak Tree Road property and from 1.0 ppm to 175,000 ppm on the 1680 Oak Tree Road Property.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.2 Response Actions to Date

The site was referred to EPA by the NJDEP in November 2011. EPA conducted several sampling events in support of preparing an RSE for the site. The RSE was finalized in July 2012.

Assistance has been requested from ATSDR in preparing a Letter Health Consult for the site. The Letter Health Consult has not yet been finalized.

In August 2012, EPA conducted a sampling event at the 1670 Oak Tree Road property in conjunction with the site assessment work at the Caswell, Strauss & Co., Inc. site. Contamination was identified above the Soil Screening Criteria for Commercial Properties of 800 ppm in two different areas of the property.

EPA requested the property owner of 1670 Oak Tree Road address the contamination on the northern portion of his property which is directly adjacent and upgradient of a portion of the property located at 1670 Oak Tree Road in which the PRP was in the process of remediating. This request was made in an effort to avoid any recontamination of the remediation work on the 1670 Oak Tree Road property.

On November 20, 2012, Geoo-Enviro Consulting & Remediation, a contractor hired by the property owner, mobilized to the property and excavated an area approximately 110 feet long by 4 feet wide to a depth of 4 inches. A total of 12.39 tons of soil was removed from the excavated area and transported to the Cumberland County Landfill for disposal, as TCLP results indicated the soil met the non-hazardous RCRA requirements. The excavated area was backfilled with one inch of p-gravel and then capped with 3 inches of concrete, finished at grade level with the existing curb. Post excavation samples were collected and indicated no levels above the 800 ppm criteria were present.

A final report of the work conducted by the property owner was presented to EPA in May of 2013. After receipt of the final report, RAB Removal Managers determined the area of contamination in the western portion of the property was not removal eligible based on the fact the area is covered by 6 - 12 inches of

stone. A letter was sent to the property owner in July 2013 from RAB management stating the area of EPA's concern had been properly remediated and that EPA's involvement with the property was no longer required, thus concluding EPA's involvement on July 10, 2013.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Efforts have been made to identify the viability of the site owner(s) and other Potentially Responsible Parties to assume responsibility for the cost of the clean up. The On-Scene Coordinator is working with the Removal Action Branch, the Office of Regional Counsel and the NJDEP in an attempt to locate all viable PRPs to recover clean up costs.

A CERCLA Settlement Agreement and Order on Consent for Removal Action was signed on July 25, 2012 by the property owner of 1660 Oak Tree Road for work to be conducted on their property. The work included implementation of measures to eliminate direct contact with lead contaminated surface soils and to prevent the migration of lead contaminated soil via surface runoff and air currents to any lands adjacent to the property, design and construction of surface water runoff control measures to prevent surface water runoff from the property from migrating onto adjacent properties, post-excavation sampling, site restoration, and maintenance activities as needed. This work was completed in December 2012.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Non-hazardous	soil	12.39 tons	EC 672172	NA	Landfill cover

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

No further activities are anticipated.

2.2.1.2 Next Steps

2.2.2 Issues

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

3.1 Unified Command

3.2 Cooperating Agencies

NJDEP
EPA

Edison DOH
ATSDR
PRP

4. Personnel On Site

PRP Contractor personnel

5. Definition of Terms

PPM - Parts Per Million

6. Additional sources of information

6.1 Internet location of additional information/report

www.epaosc.org/caswellstrauss

6.2 Reporting Schedule

7. Situational Reference Materials

No information available at this time.